

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In re:

Chapter 11

**Geralex, Inc.,**

Bankruptcy No. 16-06479

Debtor.

Honorable Pamela S. Hollis

**COVER SHEET FOR FOURTH AND FINAL FEE  
APPLICATION OF VIDAL & ASSOCIATES FOR COMPENSATION**

Name of Applicant: Vidal & Associates, Ltd..

Authorized to Provide Professional Services to: Geralex, Inc., debtor and debtor-in-possession.

Period for Which Compensation is Sought: February 1, 2016 through March 30, 2017.

Amount of Fees Sought: \$ 3,766.25

Amount of Expense Reimbursement Sought: \$ 0

This is a: Fourth and final application

The aggregate amount of fees and expenses *paid* to the Applicant to date for services rendered and expenses incurred herein is: \$ 11,310.63.

Prior fee applications:

Date Filed	Period Covered	Total Requested	Total Allowed
6/16/2016	2/26/2016 – 5/31/2016	\$2,625.00	\$2,625.00
11/18/2016	6/1/2016 – 9/30/2016	\$7,792.50	\$7,792.50
2/23/2017	10/1/2016 – 1/31/2017	\$5,766.25	\$5,766.25
<b>Total</b>		<b>\$16,183.75</b>	<b>\$16,183.75</b>

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**NOTICE OF MOTION**

Please take notice that on **June 22, 2017, at 10:00 a.m.** or as soon thereafter as counsel may be heard, the undersigned attorneys shall appear before the Honorable Pamela S. Hollis, United States Bankruptcy Judge for the Northern District of Illinois, in Courtroom 644 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, and then and there shall present the Fourth and Final Application for Allowance of Fees for Accountants to the Debtor, a copy of which is attached hereto and herewith served upon you.

Dated: May 19, 2017

**Geralex, Inc.**

By: /s/ Z. James Liu  
One of its attorneys

William J. Factor (6205675)

Z. James Liu (6313367)

**FACTORLAW**

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**CERTIFICATE OF SERVICE**

I, Z. James Liu, an attorney, hereby certify that on May 19, 2017, pursuant to Section II.B.4 of the Administrative Procedures for the Case Management/Electronic Case Filing System and Fed.R.Civ.P. 5(a), I caused a copy of the foregoing *Notice of Motion* and the accompanying *Application* to be served electronically through the Court's Electronic Notice for Registrants on all persons identified as Registrants on the below Service List and on the entities in the mailing matrix by regular U.S. Mail.

/s/ Z. James Liu

**SERVICE LIST**

**Registrants in the Case**

(Service via ECF)

Jeffrey Grant Brown	jeff@jgbrownlaw.com
William J. Factor	wfactor@wfactorlaw.com, wfactorlaw@gmail.com, bharlow@wfactorlaw.com, wfactor@ecf.inforuptcy.com
Patrick S. Layng	USTPRegion11.ES.ECF@usdoj.gov
Zhijun James Liu	jliu@wfactorlaw.com, jliu@ecf.inforuptcy.com, bharlow@wfactorlaw.com, nbouchard@wfactorlaw.com

**Accountant**

(Service via Regular U.S. Mail)

Vidal & Associates, Ltd.  
7800 N. Milwaukee Avenue  
Niles, IL 60714

**US MAIL SERVICE LIST**

Ally Financial PO Box 130424 Roseville, MN 55113-0004	Byline Bank 3639 N. Broadway Chicago, IL 60613
Gerardo Alvarado 1100 W. Cermak Rd. Suite B113 Chicago, IL 60608-4540	Glenview State Bank Law Office of Arnold H. Landis, PC 77 W. Washington Street, Ste 702 Chicago, IL 60602
Illinois Department of Revenue Bankruptcy Section PO Box 64338 Chicago, IL 60664-0338	IRS Department of the Treasury Internal Revenue Service Cincinnati, OH 45999
Nicole Caliendo c/o Brian J. McManus, Attorney 30 N. LaSalle, 2126 Chicago, IL 60602	Lynn Grande c/o Barry G. Doyle, Attorney 15255 94 <sup>th</sup> St., 5 <sup>th</sup> Floor Orland Park, IL 60462
Sprint Corp. Attn: Bankruptcy Dept PO Box 7949 Overland Park, KS 66207-0949	Peoples Gas 200 East Randolph Street Chicago, IL 60601
The Home Depot PO Box 790328 St. Louis, MO 63179	The Hartford The Hartford Financial Services Group One Hartford Plaza Hartford, CT 06155
Travelers Travelers CL Remittance Center PO Box 660317 Dallas, TX 75266-0317	The International Business Law Group 150 N. Michigan Ave. Suite 3680 Chicago, IL 60601
Visa PO Box 6492 Carol Stream, IL 60197	Unicom 12560 S. Holiday Dr. Building C Alsip, IL 60803
Geralex, Inc. 1100 W. Cermake Rd. Suite B114 Chicago, IL 60608-4540	Barbara Pfneisel Brian J. McManus & Associates 30 N. LaSalle, Suite 2126 Chicago, IL 60602-3371
American Express PO Box 001 Los Angeles, CA 90096-8000	Cermak & Racine Properties, LLC 1100 W. Cermak Rd. Chicago, IL 60608-4560

Capital One Bank (USA), N.A. PO Box 71083 Charlotte, NC 28272-1083	Hartford Fire Insurance Company Bankruptcy Unit NP3-R Hartford Plaza Hartford, CT 06155
Comcast Bankruptcy Department 1255 W. North Ave. Chicago, IL 60642-1562	Peoples Energy Attn: Bankruptcy 130 East Randolph Drive, 17 <sup>th</sup> Floor Chicago, IL 60601-6207
David Hill Chicago Real Value Fund 5431 N. Kildare Ave. Chicago, IL 60630-1792	C O American Infosource LP 4515 N Santa Fe Ave. Oklahoma City, OK 73118-7901
Hansen Cochrane & Reed, Ltd. 60 Revere Dr., Suite 960 Northbrook, IL 60062-1581	The Standard Companies 2601 S. Archer Ave. Chicago, IL 60608-5913
Internal Revenue Service Centralized Insolvency Operations PO Box 7346 Philadelphia, PA 19101-7346	University of Chicago 5801 S. Ellis Ave. Chicago, IL 60637-1546
T-Mobile T-Mobile Bankruptcy Team PO Box 53410 Bellevue, WA 98015-3410	Alejandra Alvarado 1100 W. Cermak Chicago, IL 60608-4500
Tenant 12875 Ransom St. Holland, MI 49424-9273	American Express Bank FSP c/o Becket and Lee LLP PO Box 3001 Malvern, PA 19355-0701
United Maintenance Services 1550 S. Indiana Ave. Chicago, IL 60605-4831	Commonwealth Edison Company Attn: Bankruptcy Department 3 Lincoln Center Oakbrook Terrace, IL 60181-4204

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**FOURTH AND FINAL APPLICATION FOR ALLOWANCE  
OF FEES FOR ACCOUNTANTS TO THE DEBTOR**

Gustavo Vidal and Vidal & Associates, Ltd. (the “*Firm*”), accountants to Geralex, Inc., the Debtor and Debtor in Possession, (“*Geralex*” or the “*Debtor*”) respectfully submits its Fourth and Final Application for Allowance of Compensation (“*Fee Application*”) for services rendered on behalf of the Debtor during the period from February 1, 2017 through March 30, 2017, and requests authority for the Debtor to pay the fee on an interim basis and respectfully states and alleges as follows:

**JURISDICTION**

1. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334, and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois.

2. Venue of the above-captioned case (the “*Case*”) and of this motion is proper in this Judicial District pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. §§ 157(b)(1) and (b)(2)(A) and (O).

**BACKGROUND**

3. The Debtor is an Illinois corporation with its principal place of business in Chicago, Illinois. The Debtor provides janitorial services to commercial and government facilities, such as airports and schools. It has been in business since 2003. The Debtor is differentiated in the janitorial services business by being woman- and minority-owned and engaging in environmentally sustainable practices

with a deep commitment to the community. It is owned by Alejandra Alvarado (60%) and Gerardo Alvarado (40%).

4. On February 26, 2016 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor remains in possession of its assets and is operating them as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

5. On May 12, 2016, this Court authorized the Debtor’s retention of the Firm as its accountants in this case retroactive to the Petition Date.

6. On March 30, 2017, this Court confirmed the Fourth Modified Chapter 11 Plan of reorganization.

#### **RELIEF SOUGHT**

7. By this application, the Firm seeks payment of its reasonable compensation for actual, necessary services rendered to the Debtor as provided by 11 U.S.C. §§ 330(a)(1) and 331. Such services were rendered from February 1, 2017 through March 30, 2017.

8. The services provided have all been related to accounting matters including: review of balance sheets and accounts; the preparation of monthly operating reports; negotiating with tax authorities; and advising the Debtor regarding its financial performance. The foregoing services, as set forth in further detail on the attached Exhibit A, have a value of \$3,776.25.

9. Without the aid of an accountant, the Debtor would be unable to comply with the reporting requirements of a chapter 11 debtor-in-possession, nor to comply with its obligations under various tax laws. Applicant also has assisted the Debtor in formulating the terms of a plan.

10. Every effort has been made to utilize the accountant with the lowest billing rate who could ably perform an accounting task. Accordingly, most of the services were performed by Carmen Jimenez, a staff accountant at the Firm.

11. At the hearing on the Firm’s first interim fee application, this Court admonished the Firm for billing in .25-hour increments instead of .1-hour

increments. However, the Court still granted the fees in full for the first and second interim applications because of the reasonable rates charged by the Firm.

12. Moreover, the Firm is unable to practically bill using .1-hour increments. The Firm uses software called Practice CS, an integrated accounting practice management software suite created by Thomson Reuters. That software is set for .25-hour increments, and it would be impractical to record .1-hour increments for only one client.

13. The Firm submits that its billing structure and rates are still very reasonable for the level of services performed. For this application period, the lodestar rate for services performed was \$83.45 per hour.

14. This Application is the fourth and final application for compensation and expense reimbursement that the Firm has filed in the Case. The fees for services (the “*Services*”) provided by the Firm during the Application Period are broken by professional as follows:

Professional	Title	Hourly Rate	Total Hours	Value
Gustavo Vidal	Principal	\$160	4.5	\$720.00
Carmen Jimenez	Staff Accountant	\$75	40.75	\$3,056.25
<b>Totals:</b>			<b>45.25</b>	<b>\$3,776.25</b>

15. The Firm has not received any retainer from the Debtor.

16. No expense reimbursement is sought in this application.

**WHEREFORE** Vidal & Associates, Ltd., respectfully requests an order award it \$3,776.25 in compensation, and to award all compensation previously awarded interim compensation on a final basis, as provided by 11 USC § 330.

Dated: May 19, 2017

**Vidal & Associates, Ltd.**

By: /s/ Z. James Liu  
One of the Debtor's attorneys

William J. Factor (6205675)

Z. James Liu (6313367)

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